



IN REPLY REFER TO:

United States Department of the Interior

FISH AND WILDLIFE SERVICE

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Dockets Management Branch (HFA-305)
Food and Drug Administration
5630 Fishers Lane, Rm 1061
Rockville, MD 20852

**Comments on Docket # 99D-2638 Use of Medicated Feeds for Minor Species;
Draft Compliance Policy Guide**

Although a step in the right direction, these guidelines do not go far enough to allow Veterinarians to provide the most effective treatment to the animals and also the treatment of least risk to public health.

Even with the addition of the few drugs that these Guidelines will allow, Fish Health Practitioners will be unable to follow the Principles of Judicious Antimicrobial Use published by the American Veterinary Medical Association (JAVMA January 15, 1999) that are intended to reduce the risk of pathogenic organisms from developing resistance to antimicrobial agents. These Principles also serve to reduce the risk of resistance development in human pathogens from the use of antimicrobial agents in food animals.

Many drugs approved for use in food animals by an oral route do not have a feed formulation and hence still do not fall under these proposed Guidelines. However, in some cases they would be better therapeutic choices, using both efficacy and public health criteria, than one of the few drugs approved for medicated feeds.

These therapeutic considerations are of major importance to industries such as Aquaculture where it is sometimes necessary to treat thousands of animals at a time for a systemic bacterial infection. In this situation, the oral route is the only practical means to administer a treatment that will effectively stop morbidity and mortality in the population.

Please consider a change in these Guidelines to include all oral antimicrobial agents approved for use in food animals if an appropriate withdrawal time is applied.

Sincerely,

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